

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

No. H-92-0177-05

PATRICIA LEBARON

MOVANT'S STATUS REPORT

Counsel for Patricia LeBaron files this status report in advance of the status conference scheduled for April 14, 2023.

Documentation: Counsel believes that the Bureau of Prisons has provided all documentation necessary to complete counsel's supplement to Ms. LeBaron's motion for a reduction in sentence. Her counsel and AUSA Hanes discussed how different documents had been provided to counsel in different formats and at different times, and AUSA Hanes agreed to confirm with BOP that no additional documents remained outstanding.

Expert examination and report: Counsel for Ms. LeBaron contracted with a psychologist who specializes in the research and treatment of severe trauma, particularly women, including refugees fleeing torture, human trafficking and war. The expert completed her interviews with Ms. LeBaron by the end of February.

Counsel expects her final report to be ready for disclosure to the government by the end of April.

Release plan: Counsel and the FPD Mitigation Specialist are developing a release plan for Ms. LeBaron. The release plan addresses her proposed living arrangements, ways to accomplish Ms. LeBaron's need for adjustment assistance in the form of counseling, and the legal pathway for Ms. LeBaron to be recognized as a United States citizen. The release plan requires coordination and input with other providers, including immigration counsel. Undersigned counsel expects the release plan to be finalized before the end of May.

In light of the foregoing, counsel expects to file an amended Motion for Early Release by the end of May 2023.

Respectfully submitted,

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By s/ Michael Herman
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CERTIFICATE OF SERVICE

I certify that today, April 11, 2023, the foregoing status report was served upon all counsel of record by notice of ECF filing, and by email upon AUSA Richard Haynes.

s/ Michael Herman
MICHAEL HERMAN